Interchange 360
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Getting Started with Interchange 360

A Quick Start Guide to Registering, Reporting, Remitting, and More

July 2026

Legal disclaimer

This document should be used for informational purposes only and should not be construed as legal advice.
Individual producers are encouraged to consult with their own legal counsel regarding their specific compliance obligations.

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Overview

Interchange 360 supports petroleum and lubricant industry producers in meeting Extended Producer Responsibility (EPR) regulations for petroleum and petroleum-related products and their associated packaging.

This guide summarizes the essential steps for determining producer status, registering, reporting, remitting fees or dues, and understanding other key elements of EPR programs, including supply chain agreement best practices and fee-setting considerations.

This guide is intended as a starting point for all Interchange 360 specific requirements. Producers are encouraged to contact **MemberServices@Interchange360.com** to schedule a discussion about program details, state-specific requirements, or general questions about EPR compliance.

Interchange 360

About Interchange 360

Interchange 360 is a trademark used by Lubricants Packaging Management Association (LPMA), a national nonprofit that supports petroleum and automotive product producers with Extended Producer Responsibility (EPR) compliance. Interchange 360 provides cost-effective, transparent, and sustainable solutions for managing petroleum and petroleum-related products and packaging. Through collaboration and innovation, Interchange 360 helps the petroleum and automotive sector navigate the evolving landscape of EPR in the United States.

Why Interchange 360

Interchange 360 was founded as an EPR compliance solution to meet the specific needs of the petroleum and lubricant industry. Its value is centered on harmonization, cost efficiency, and improved environmental outcomes.

Harmonization across EPR laws

Petroleum and lubricant products may fall under packaging, household hazardous waste, or automotive fluids EPR or other product stewardship laws. Interchange 360 is designed to provide consistent reporting and fee structures, along with a dedicated service team, regardless of state or type of law.

Cost efficiencies

Shared resources across states and EPR laws can reduce compliance costs and staff time. Within state legal requirements, Interchange 360 tailors program elements such as eco-modulation and program goals to the industry's materials and needs.

Improved environmental outcomes

Interchange 360 seeks to ensure producers are paying into a system where their products are recycled responsibly rather than sent to landfill.

Why the Industry Needs Its Own Program

Many packaging EPR laws are built around materials that belong in curbside collection systems. Lubricant containers are different. They are typically made from industrial-grade high-density polyethylene and are designed to withstand transport, temperature shifts, and chemical exposure. After use, they can retain trace amounts of lubricant that municipal recycling systems are not equipped to manage.

Because these containers cannot be placed in blue bin recycling systems, they may be treated as non-recyclable in traditional packaging EPR programs. This can result in higher fees for producers and may lead to materials being landfilled rather than recovered and recycled.

Interchange 360 is designed as a recovery system tailored to the industry's materials and operational realities, while also including measurable outcomes and transparent reporting standards aligned with state compliance requirements. The goal is to be a compliance option for the industry in any state with an EPR law covering these products.

Program Purpose and Objectives

Help producers **meet regulatory requirements** through a **cost-efficient** program designed for the industry.

Ensure sufficient Return Collection Facilities (RCFs) for DIY consumers to **return approved materials at no cost.**

Promote **responsible environmental handling** through landfill diversion, recycling using eco-friendly methods, and active product stewardship.

Support safe **collection, transport, storage, processing, and disposal.**

Producer Determination and Registration

What Is an Obligated Producer?

Each state defines “producer” differently under their EPR laws, and a producer’s obligations may vary from state to state. A company may be considered a producer if you are one of the following:

Brand or trademark owner
Manufactures or controls the brand of covered materials.

Licensee
Directs production of packaging under a licensed brand.

Manufacturer
Produces packaging when no identifiable brand exists.

Importer
Is the first entity to import products into the United States.

Retailer
Sells private-label products.

Distributor
Is the first to distribute a covered product into the state.

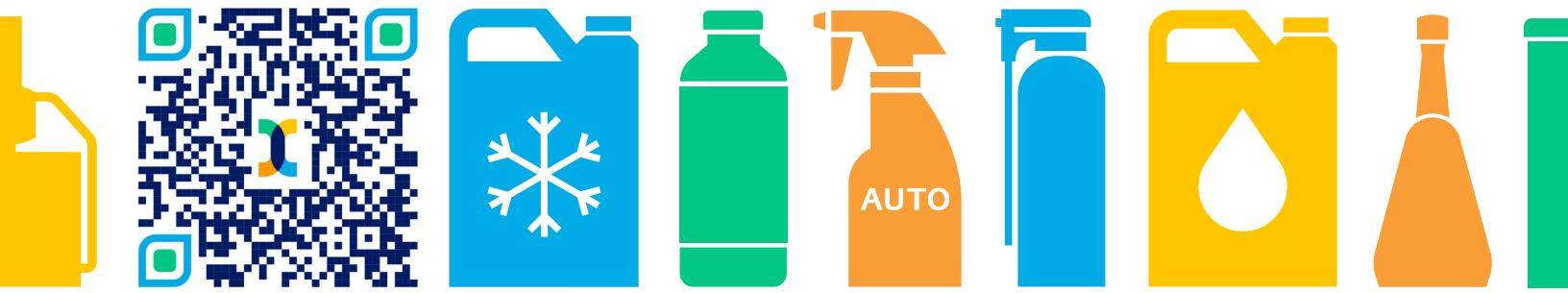
Producers should consult legal counsel regarding their specific obligations. State compliance authorities may prohibit the sale of covered products, levy fines for violations, or request proof of compliance from any member of the supply chain at any time.

Note: For e-commerce sales, responsibilities may include both packaging and shipping material producers. Consult state-specific EPR regulations for detailed responsibilities.

Applicable Products List

The Interchange 360 Applicable Products List provides guidance on the types of materials managed, collected, and processed by programs where Interchange 360 is either a compliance option, has a pathway to compliance, or offers the Leaders Program (See page 19 for more information on the Leaders Program). Producers should review each individual state program for specific details.

The list is intended to cover petroleum and lubricant products broadly. It is not limited to automotive products and may include household, marine, outdoor equipment, and other similar products. If a specific product is not listed, producers should determine whether it may fall within another listed category.



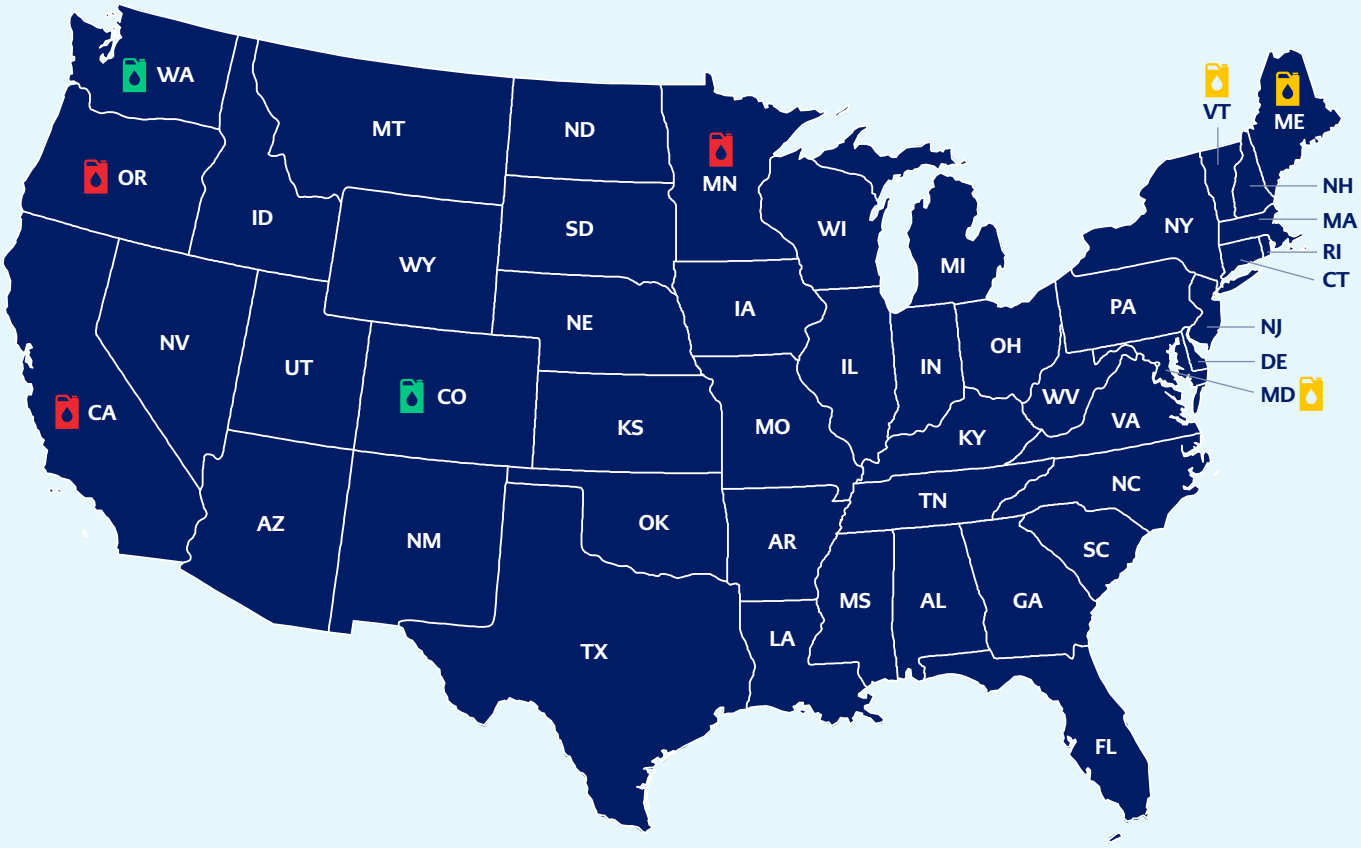
Scan the QR code or visit **interchange360.com/producers** to view the list of currently applicable products.

State-by-State Compliance Option Status

State laws use different terminology and provide different pathways for compliance. Interchange 360 intends to be an independent compliance option for the petroleum and lubricants industry in every state with an applicable EPR law. Producers should visit the relevant state page on **Interchange360.com** for the most current information.

State	Status as of August 14, 2026
California	Petroleum and lubricant products currently fall under SB 54. Interchange 360 is seeking to establish an Alternative Collection Program under the PRO in accordance with the law. Interchange 360 offers the Leaders Program, while seeking industry compliance alternatives.
Colorado	Interchange 360 has an Individual Program Plan approved. Producers not registered with the state under a separate Individual Program Plan are required to register with Interchange 360 to be in compliance.
Maine	Interchange 360 is applying to be an Alternative Collection Program.
Maryland	Interchange 360 is applying for either an Individual Program Plan or Alternative Collection Plan.
Minnesota	Petroleum and lubricant products currently fall under Minn. Stat. § 115A. 144-115A.1463. Interchange 360 offers the Leaders Program, while seeking industry compliance alternatives.
Oregon	Petroleum and lubricant products currently fall under SB582. Interchange 360 offers the Leaders Program, while seeking industry compliance alternatives.
Vermont	Beginning in 2027, the state allows for individual Stewardship Organizations for product classes such as automotive products. Interchange 360 will follow this path.
Washington	Interchange 360 has been acknowledged as an Alternative Collection Program. Producers who do not have their own individual program should register with

Compliance Option Status by State



Current compliance option

Future compliance option
Existing Compliance Pathway

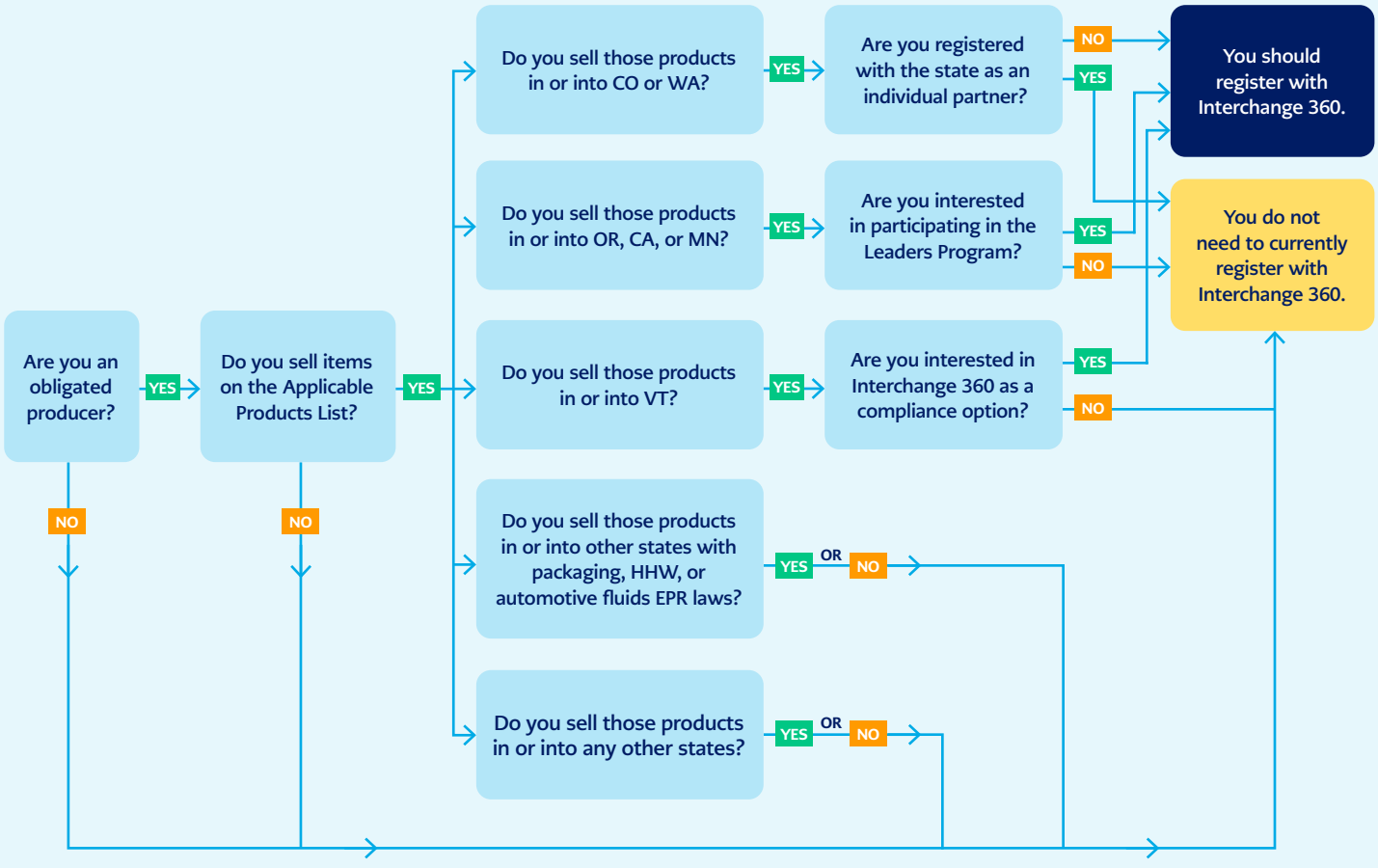
Not currently a compliance option
Leaders Program Available

Registration Guidance

Producers should begin by determining whether they are obligated and whether they sell products on the Applicable Products List into states where Interchange 360 is a compliance option, has a pathway to compliance, or offers the Leaders Program.

- If a producer sells covered products in or into Colorado or Washington and is not registered with the state as an individual producer, the producer should register with Interchange 360 to be in compliance with state regulations.
- If a producer sells covered products in or into Vermont, Interchange 360 may be used as a compliance option.
- If a producer sells covered products in or into Oregon, California, or Minnesota, the producer may consider participating in the Leaders Program.

For other states with packaging, household hazardous waste, or automotive fluids EPR laws, and there is a compliance pathway for Interchange 360, producers should consider participating in the program.



How to Register

To register in each state, complete the following steps:

1. **Visit the relevant state page on Interchange360.com.**
2. **Download the state-specific Participation Agreement.**
3. **Create an account or sign in to an existing account in The Vault*.**
4. **Select the state in which you are registering.**
5. **Complete the prompts.**
6. **Upload your signed Participation Agreement.**

**The Vault is Interchange 360's secure, online reporting portal.*

Registration support

Training materials are available to assist with setting up an account and reporting. In states where Interchange 360 is in the early stages of launching a program, registration through The Vault may not yet be available. In those cases, producers should return the signed Participation Agreement to **MemberServices@Interchange360.com** according to the instructions on the relevant state page.

Participation Agreements

Each state program has a separate Participation Agreement. Participation Agreements are tailored to comply with each state law, are standard for all producers, and cannot be modified for individual producers. Producers may submit feedback, which will be kept on file for future consideration.

Reporting

Reporting Overview

Reporting is completed through Interchange 360's secure online portal, The Vault. Producers report sales data by volume for each state program on a monthly, quarterly, or annual basis, depending on the option they choose. Quarterly reporting is the default and most frequently used option.

Monthly or quarterly reporting

Producers have 30 days from the end of the reporting period to submit data and 60 days from the end of the reporting period to remit payment. For example, for a reporting period ending March 31, a producer has 30 days to report and 60 days from that time to remit.

Annual reporting

Annual reporting requires prepayment based on the prior year's data. The following January, the account is reconciled based on actual data, and the producer is either charged or credited for the difference. For example, in Year 1 a producer on the annual plan would prepay using actual data from the previous year. Then in January Year 2, using the actual data from Year 1, the account would be either credited or charged based on what the producer paid the previous January. The producer would also pay for all of Year 2, based on their Year 1 data.

Information Needed to Report

Once an account is set up in The Vault, producers must have reporting information available for each applicable product and state program.

1 Product type

Motor Oils

Aerosols
- Automotive Parts Cleaner
- Boosters
- Brake Cleaner
- Brake Fluids
- Conditioners
- Degreasers
- Fuel System Cleaner
- Lubricant
- Sealants
- Solvents
- Stabilizers
- Other Products

Coolants

Diesel Exhaust Fluid

Other Products
- Boosters
- Brake Fluid
- Conditioners
- Degreasers
- Fuel System Cleaner
- Lubricants
- Sealants
- Solvents
- Stabilizers
- Windshield Washer Fluid

2 Container size for each product type

3 Number of units sold of each product

4 Material type for each product

- Bag-in-Box
- Fiber Grease Cartridges
- HDPE
- Other Plastic Flexible
- Other Plastic Rigid
- Other
- Paper/Fiber
- PET
- PP
- PVC

5 Percentage of post-consumer recycled (PCR) content used in each product

Who Can Report

Registering, reporting data, and remitting fees/dues are the responsibility of the obligated producer under EPR laws. However, obligated producers may make arrangements with others in their supply chain to report and remit fees on their behalf for efficiency and accuracy purposes.

In cases where the obligated producer, typically the brand owner, has full visibility of its supply chain network and access to state-level distribution data, it usually reports and remits for itself.

However, in cases where distributors are used or similar scenarios where the obligated producer may not have access to state-level sales data, others in the supply chain may report and pay fees on behalf of an obligated producer if a Supply Chain Agreement is reached between each party. The Supply Chain Agreement, therefore, determines who is responsible for reporting and remitting fees, even in cases where that party may not be obligated under the law.

Supply Chain Agreements

Supply Chain Agreements are often used by producers for several reasons, such as:

- Distributors may have more accurate data in terms of what state a product is being sold in and how much of it is being sold.
- For some producers it may be more efficient compared to collecting data from different distributors, aggregating, and reporting it.
- Distributors may also have the reporting infrastructure in place if already doing it for other producers.

A Supply Chain Agreement that clearly shows who is responsible for reporting will be part of the verification process during the compliance review process. If no written agreement is in place, both parties could be determined responsible for reporting and payment. It is ultimately the obligated producer, as defined by the law, that is responsible for ensuring covered materials are reported.

Please refer to **Guidance: Who Should Register for Purposes of Compliance & Reporting** for a sample Supply Chain Agreement and related resources.

Fees and Dues

Fees and Dues Overview

The foundation of EPR programs are the fees (or dues depending on the state) producers pay to the compliance organization to manage the program and meet the producers' obligations under the law.

The costs associated with an EPR program are determined by several factors and vary from state to state, but primarily include:

- Providing recycling services and necessary infrastructure;
- Implementing required public education and outreach programs;
- Meeting reporting, auditing, and verification requirements;
- Conducting needs assessments and program plan development;
- State administration, implementation, and enforcement costs;
- Administrative costs associated with running the program; and
- Other state mandated fees.

Once the initial budget for the program is determined based upon the best available data, the compliance organization must then consider the total amount of covered materials being sold into that state and calculate the operational budget required to recycle all materials. Collection and processing costs make up the vast majority of the total budget.

State EPR laws provide strict guidelines on how producer fees can be used and require specific publicly available reporting requirements and audits for the compliance organization.

Once program costs are factored, state-mandated eco-modulation requirements must be considered. Eco-modulation is an established set of criteria that provides bonuses and/or disincentives to producers encouraging more recyclable, reusable, or compostable products. Eco-modulation must be applied while still ensuring the overall costs of the program are covered.

Fees/Dues are reviewed and recalibrated on a regular basis to reflect any changes to program costs as well as eco-modulation factors.

Eco-Modulation

Eco-Modulation is a tool within EPR policies used to incentivize packaging design to be more recyclable, compostable, and/or reusable through the adjustment of base fees.

It can include:

Bonuses/Incentives
Reduction in fees based on certain criteria deemed to make the packaging more environmentally friendly

Maluses/Disincentives
Increase in fees for packaging designs deemed less environmentally friendly based on set criteria.

Eco-modulation was a key driver behind the formation of Interchange 360, to ensure producers of petroleum and automotive products would not have to pay excessive fees for industry materials that are not recycled through a curbside program.

Interchange 360 will only include eco-modulation factors in states that require it by law. Guidance will be provided for each state with eco-modulation factors.

Program Cost Factors

Depot infrastructure, collection, transportation and processing.

Staffing, legal support, data and financial services portal, program audits, annual reports.

Communications, marketing and awareness efforts.

Department oversight costs, contributions to state needs assessment studies, specific requirements on contingency funds, and contributions to special account.

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Eco-Modulation

Must meet statutory and regulatory requirements in each state.

Interchange 360 to ensure eco-modulation factors are meaningful to registered producers while fitting within the guidelines of the law.

Interchange 360 to strive for as much consistency as possible in setting both threshold criteria and rates to provide consistent market signals to producer members.

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Material Fee Determination

Fee Setting Policy

In Fall 2025, Interchange 360 convened a working group of manufacturers, distributors, and retailers to develop a fee/due setting policy that ensures consistency, equity, and transparency across all jurisdictions where Interchange 360 operates. The policy ensures future fees/dues meet regulatory obligations for each state while providing fairness, covers the cost of the program, and allow producers to plan and adapt effectively.

The policy consists of the following four principles:

1

Consistency

Fee-setting methodology will be used consistently across all states.

2

Equity

Fees are assessed based on the cost to manage each product type.

3

Clarity

Fee-setting setting will be clear and transparent.

Advanced Lead Time: Notice of any changes to fees in advance of implementation to provide producers with the ability to prepare.

4

Compliance

Fee-setting will account for state requirements, including eco-modulation, collection targets, and other program fees.

The policy also calls for the following four-step process in setting fees:

1. Assess the costs to manage each product type.
2. Establish a cost-based fee for each product type.
3. Apply state eco-modulation requirements, if applicable.
4. Provide notification within a reasonable time frame (e.g. 90-days) to affected participating producers of any fee changes. Exceptions may be necessary to implement changes in a shorter time frame if required by law, rule, regulation, or the relevant government authority.

The full policy can be downloaded at **Interchange360.com/fee-setting**

Determining Your Fees/Dues

Fees/Dues are based on a per gallon rate. Rates may vary due to container size, packaging material, and/or eco-modulation factors. When reporting in The Vault, your fees/dues are automatically calculated based on the volume and other information you enter for each product category.

When first registering for a state program, producers are required to pay back to the start date. Fees/dues may change over time. A history of fee/dues changes and time frames will be included on each state page. When calculating any past dues, make sure to reference historical rates for the relevant time periods.

For the most up-to-date fee/dues schedule, visit each state page on **Interchange360.com** or **Interchange360.com/producer-fees-dues**

Leaders Program

Interchange 360's Leaders Program is a foundational collection program designed to demonstrate responsible management of petroleum and lubricant materials in states and counties where full EPR programs are not yet active. The program currently includes California, Oregon, and Minnesota.

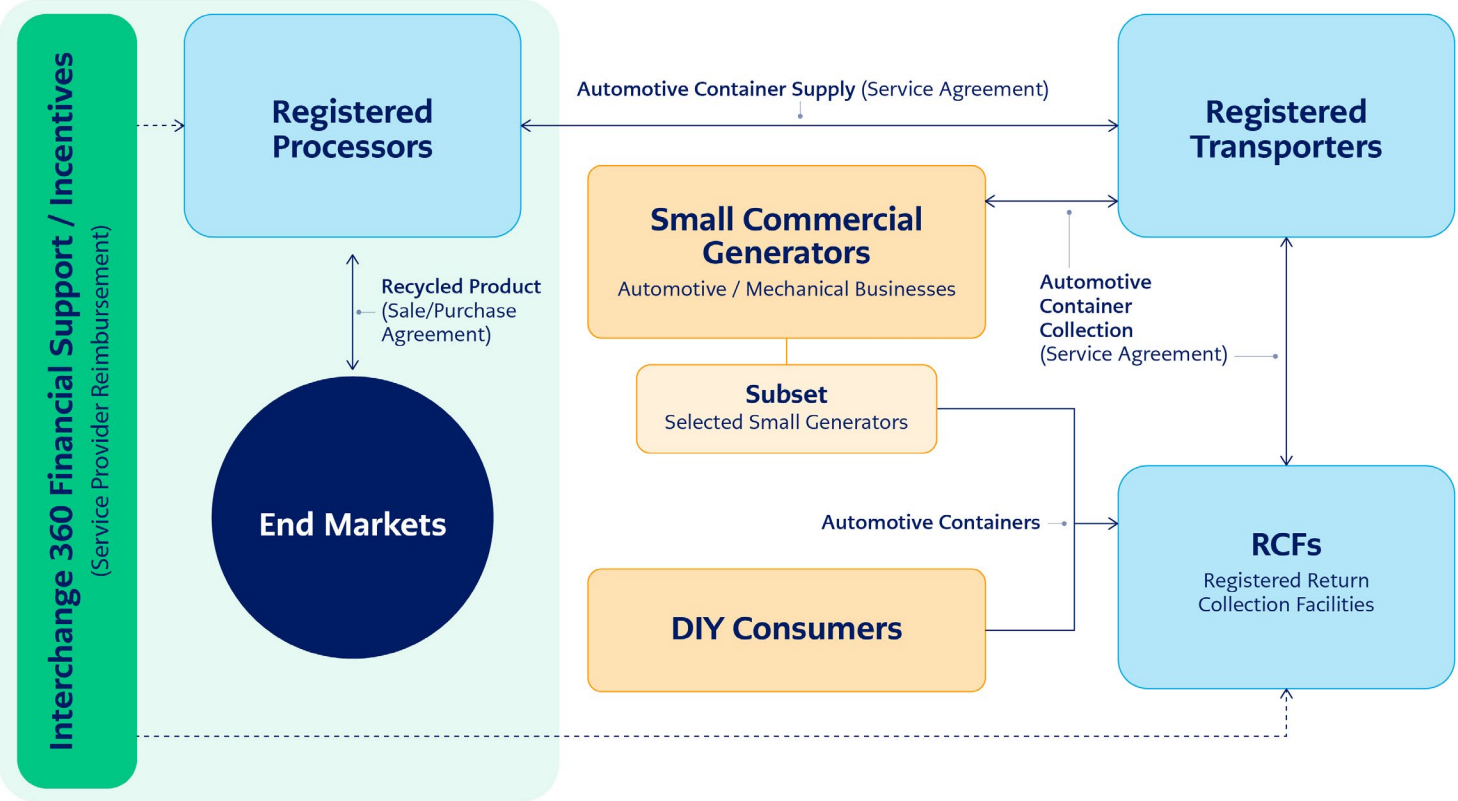
The Leaders Program allows industry to show environmental leadership now, while helping build the data, infrastructure, and best practices needed for future EPR requirements.

Many jurisdictions are preparing for EPR, but formal compliance pathways for petroleum and automotive packaging are still emerging. The Leaders Program bridges that gap by:

- Supporting existing collection networks with clear expectations and consistent handling practices.
- Showing readiness to comply before mandates begin or compliance approvals are granted.
- Providing early data and insights to help shape future state programs.
- Improving environmental outcomes by diverting petroleum and automotive packaging from improper disposal.

Any producer can participate in the Leaders Program. The registration process is the same as other programs; by completing the Participation Agreement for California, Minnesota, and/or Oregon, producers are enrolled in the program.

Collection Model



Interchange 360's standard collection model connects existing collection sites, haulers, and processors into a unified, audited network. Containers are collected at service stations, quick-lube centers, public depots, and distributors rather than through curbside collection systems.

Collected containers are drained, bulked, and transported to facilities equipped to manage plastics that have held lubricants. The materials are then cleaned, shredded, and re-extruded into clean HDPE resin for new industrial applications such as pails, pipe, and molded products.

Recyclers are paid through an incentive-based system tied to the volume processed. This approach is intended to ensure producers pay for material that is actually recycled.

Key Acronyms

Below is a list of some of the important acronyms related to Interchange 360:

ACP Alternative Collection Plan

CAA Circular Action Alliance

CPG Consumer Product Goods

EPR Extended Producer Responsibility

HHW Household Hazardous Waste

IPP Independent/Individual Program Plan

LPMA Lubricants Packaging Management Association (Interchange 360 legal name)

NLCRC National Lubricant Container Recycling Coalition

PPA Poison Prevention Act

PRO Producer Responsibility Organization

PSI Product Stewardship Institute

SO Stewardship Organization

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Contact Information

Questions about Interchange 360 programs, registration, reporting, or remittance can be directed to Member Services.

Website: **interchange360.com**

Email: **MemberServices@interchange360.com**

LinkedIn: **@interchange360**

Facebook / Instagram: **@interchange360**